

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RELEVENT SPORTS, LLC,

Plaintiff,

v.

FÉDÉRATION INTERNATIONALE DE  
FOOTBALL ASSOCIATION and UNITED  
STATES SOCCER FEDERATION, INC.,

Defendants.

No. 1:19-cv-8359 (VEC)

**DECLARATION OF SUNIL GULATI IN SUPPORT OF  
FIFA’S RENEWED MOTION TO DISMISS THE AMENDED COMPLAINT**

I, Sunil Gulati, hereby declare pursuant to 28 U.S.C. § 1746:

1. I was the President of United States Soccer Federation, Inc. (“USSF”) from 2006 to 2018, and a member of the FIFA Council from 2013 to 2021.

2. I submit this declaration in support of FIFA’s renewed motion to dismiss Plaintiff’s Amended Complaint. The statements in this declaration are based on my personal knowledge.

3. I understand that Relevant, the plaintiff in this action (“Plaintiff”), alleges in Paragraphs 39, 84, 116, and 117 of its Amended Complaint that I participated in the FIFA Council’s consideration and adoption of the October 26, 2018, press release at issue in this matter, in which the FIFA Council “emphasised the sporting principle that official league matches must be played within the territory of the respective member association” (the “2018 Press Release”). Plaintiff further alleges that I did so “with the goal of shielding . . . [Major League Soccer] from official season games competition from foreign leagues.” (*Id.* ¶ 39; *see also id.* ¶¶ 114, 115.) That

is fundamentally incorrect. As an initial matter, the FIFA Council does not consider or adopt press releases, and in fact I did not even see the press release in advance of its dissemination.

4. The FIFA Council's vote on the issue referenced in the 2018 Press Release (*i.e.*, whether official league matches should be played within the territory of the respective member association) occurred at a FIFA Council meeting held in person in Kigali, Rwanda on October 26, 2018.

5. Although I was a member of the FIFA Council at the time that the 2018 Press Release was issued, I did not take part in the underlying vote concerning whether official league matches were required to be played within the territory of the respective member association; consistent with my past practices, I formally abstained from the vote.

6. I further understand that Plaintiff alleges that FIFA and USSF have a principal-agent relationship, in which USSF acts as an agent of FIFA, including through my actions. That too is incorrect.

7. USSF is not and has never been an agent of FIFA, and at no time when I was affiliated with USSF, was USSF authorized to act on behalf of FIFA.

8. I also am not and have never been an agent of FIFA, and I am not authorized to act on behalf of FIFA.

9. At no time did I take any action on behalf of FIFA—whether in New York or otherwise—with respect to either Relevant's 2018 application to host a regular season game between two teams from La Liga in Miami, or 2019 application to host a regular season league game between two teams from Ecuador's top professional league in Miami.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on December 11, 2023.  
New York, New York

A handwritten signature in black ink, appearing to read "Sunil Gulati", written over a horizontal line.

Sunil Gulati